

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**AIC, INC. et al.,**

**Defendants,**

**and**

**ALLIED BEACON PARTNERS, INC. (f/k/a**  
**Waterford Investor Services, Inc.) et al.,**

**Relief Defendants.**

**MOTION TO EXTEND TIME FOR DISCLOSURE OF EXPERT TESTIMONY**

1. Presently, pursuant to the Court's scheduling order (Doc. 41) and subsequent order resetting the jury trial in this matter for September 23, 2013 (Doc. 70), the Commission must disclose any expert testimony in accordance with Federal Rule of Civil Procedure 26(a)(2) by no later than 150 days before trial, or April 26, 2013.

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3. As discussed at the recent hearing before Magistrate Judge Guyton, the brief extension sought is required because additional depositions are set for the remainder of this week and next week, including after the currently operative April 26 expert disclosure deadline. In addition, defendants AIC, Inc., Community Bankers Securities, LLC, and Nicholas D. Skaltsounis and relief defendants Allied Beacon Partners, Inc. (f/k/a Waterford Investor Services, Inc.), Advent Securities, Inc., and Allied Beacon Wealth Management, LLC (f/k/a CBS Advisors, LLC) (collectively, the “AIC Defendants”) have recently made available numerous boxes of documents that were the subject of this Court’s order of March 5, 2013 (Doc. 85), and are in the process of identifying additional boxes which will be produced shortly. The additional time requested will also allow the Commission time to review these recently obtained materials and to discuss them with potential expert witnesses to determine whether they may impact any opinions.

4. Defendant Guyette, and the AIC Defendants (through counsel), have consented to the requested extension. The Commission has not been able to reach Mr. Graves to discuss this proposed extension. He is currently incarcerated in federal prison.

5. The proposed extension will have no effect on the final pretrial conference or the trial in this matter. The final pretrial conference is currently set for September 13, 2013, and the trial is set to begin on September 23, 2013, and the extension sought through this motion will have no effect on these scheduled dates.

WHEREFORE, Plaintiff respectfully requests an extension of the expert disclosure deadlines as noted above and reflected in the proposed order being submitted along with this motion.

Respectfully submitted,

Dated: April 23, 2013.

S/ Michael J. Rinaldi

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Michael J. Rinaldi

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**SECURITIES AND EXCHANGE COMMISSION**

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**CERTIFICATE OF SERVICE**

I hereby certify, this twenty-third day of April, 2013, that I served a true and correct copy of the foregoing, by the means indicated, upon the following:

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S/Michael J. Rinaldi  
Michael J. Rinaldi